

Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

LAKEWAY INVESTMENT CORP., a  
Washington corporation,

Plaintiff,

vs.

SAFECO INSURANCE COMPANY OF  
AMERICA, a Washington corporation,  
AMERICAN ECONOMY INSURANCE  
COMPANY, an Indiana corporation, and  
RESOLUTE MANAGEMNT, INC., a  
Nebraska corporation,

Defendants.

No. 3:18-cv-05246

STIPULATED MOTION TO DISMISS  
WITHOUT PREJUDICE

**NOTE ON MOTION CALENDAR:**

February 12, 2021

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Lakeway Investment Corp., by and through its counsel Nicholas A. Thede and Kyle A. Sturm of Foreman Sturm & Thede LLP, and defendants Safeco Insurance Company of America and American Economy Insurance Company, by and through their counsel Matthew S. Adams and Charles A. Henty of Forsberg & Umlauf, P.S., and Resolute Management, Inc., by and through its counsel Michael S. Rogers of Reed McClure, that the above-captioned lawsuit, as to all claims and defendants, be dismissed without prejudice and without an award of costs, fees, or disbursements

1 to any party, this matter having been confidentially settled and compromised between plaintiff  
2 and all defendants.

3 DATED this 12th day of February, 2021.

4 **FOREMAN STURM & THEDE, LLP**

5 By: /s/ Nicholas A. Thede  
6 Kyle A. Sturm, *Admitted Pro Hac Vice*  
7 Email: kyle@foremansturm.com  
8 Nicholas A. Thede, WSBA No. 43765  
Email: nick@foremansturm.com  
*Attorneys for Lakeway Investment Corp.*

9 **FORSBERG & UMLAUF, P.S.**

10 By: /s/ Matthew S. Adams  
11 Matthew S. Adams, WSBA No. 18820  
12 Email: MAdams@FoUm.law  
13 Charles A. Henty, WSBA No. 39222  
14 Email: CHenty@FoUm.law  
*Attorneys for Safeco Insurance Company  
of America and American Economy  
Insurance Company*

15 **REED MCCLURE**

16 By: /s/ Michael S. Rogers  
17 Michael S. Rogers, WSBA No. 16423  
18 Email: mrogers@rmlaw.com  
*Attorney for Resolute Management, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury that on the date given below I caused to be served the foregoing STIPULATED MOTION TO DISMISS WITHOUT PREJUDICE on the following individuals in the manner indicated:

Mr. Matthew S. Adams  
Mr. Charles A. Henty  
Forsberg Umlauf P.S.  
901 Fifth Avenue, Suite 1400  
Seattle, Washington 98164  
(X) Via ECF

Mr. Michael S. Rogers  
Reed McClure  
1215 Fourth Avenue, Suite 1700  
Seattle, Washington 98161  
(X) Via ECF

SIGNED this 12th day of February, 2021, at Portland, Oregon.

/s/ Nicholas A. Thede  
Nicholas A. Thede